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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF WITNESS WHITEMAN'S RESPONSE TO PUBLIC REPRESENTATIVE INTERROGATORY PR/USPS-T12-8

The United States Postal Service hereby moves for late acceptance of the response of witness Whiteman to the interrogatory listed above from the Public Representative, filed January 5, 2012. The response is several months late. The Postal Service thanks APWU for bringing the absence of this response to our attention. Since the absence of the response has not previously drawn attention, interest in its subject would appear quite limited. The first two months of delay related to the complexity of the response and coordination necessary to generate the response. Since then, inadvertence of counsel appears to be the root cause. Any prejudice is accordingly for parties to resolve for themselves. The Postal Service regrets the delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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